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January 29, 2025

The Honorable Laurie Selber Silverstein
United States Bankruptcy Court for the District of Delaware
824 North Market Street, 6th Floor
Wilmington, DE 19801

Re: *In re UpHealth Holdings, Inc., et al.*, Case No. 23-11476

Dear Judge Silverstein:

I write on behalf of the Official Committee of Unsecured Creditors (the “Committee”) to join in the Debtors’ letter request that the Court set a deadline for confirmation related depositions. D.I. 1259 (the “January 29 Letter”).

On December 16, 2024, the Global Parties served a notice seeking deposition testimony from a representative of the Committee pursuant to Fed. R. Civ. P. 30(b)(6).¹ Since that time, the Committee has completed its production of documents and filed the *Declaration of Joshua Nahas of Dundon Advisers, LLC In Support Of Confirmation of the Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of UpHealth Holdings, Inc. And Its Affiliated Debtors*. [D.I. 1252]. In addition, and as noted in the Debtors’ January 29 Letter the Debtors have completed their document production.

As such, the Global Parties are amply equipped to prepare for and take Mr. Nahas’ deposition on the schedule proposed by the Debtors.

Respectfully,

/s/ Brett D. Fallon

Brett D. Fallon

BDF/cmg

cc: All Counsel of Record via CM/ECF
All parties via CM/ECF and certain parties by email

¹ As stated on the record at the January 14, 2025 hearing, the parties have agreed upon the deposition topics.